

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA,	§	
	§	
v.	§	CIVIL CASE NO: 2:18-CV-00004
	§	
ALL ASSETS AND FUNDS ON DEPOSIT	§	
OR HELD IN OFFSHORE INVESTMENT	§	
ACCOUNT AT SUN LIFE FINANCIAL	§	
INVESTMENTS (BERMUDA) LTD.,	§	
CONTRACT NUMBER 28-2873-017053	§	
IN THE NAME OF	§	
SILVIA BEATRIZ PEREZ-CEBALLOS,	§	

**MOTION FOR DISMISSAL OF ACTION BY PLAINTIFF**

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, the United States, Plaintiff, seeks dismissal of this forfeiture in rem action by Court order. In support of this request Plaintiff advised the Court that it has conferred with counsel for Claimant, Silvia Beatriz Perez-Ceballos, and he agrees that the civil forfeiture action should be dismissed and does not oppose the filing of this motion as evidenced by counsel's electronic signature below.<sup>1</sup>

In support of this motion, Plaintiff advised the Court that there are no pending counterclaims and asks that this forfeiture action be dismissed with prejudice. All the parties in this action agree to the dismissal and stipulate the dismissal is with prejudice. All parties agree to bear their own costs and attorneys' fees.

Respectfully submitted,

RYAN K. PATRICK  
UNITED STATES ATTORNEY  
BY:

/s/Mary Ellen Smyth  
Mary Ellen Smyth  
Assistant U.S. Attorney  
11204 McPherson Road, Ste. 100A  
Laredo, Texas 78045  
(956) 723-6523

FERTITTA REYNAL, LLP

BY:  
/s/ F. Andino Reynal  
F. Andino Reynal  
Attorney for Claimant Silvia Perez-Ceballos  
815 Walker Street, Suite 1553  
Houston, Texas 77002  
(713) 228-5900

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<sup>1</sup> Plaintiff has made several attempts to telephonically confer with counsel for the Mexican State of Tabasco since July 30<sup>th</sup>, 2019, but has been unsuccessful.

**CERTIFICATE OF SERVICE**

On this 30<sup>th</sup> day of August, 2019, the undersigned Assistant United States Attorney for the Southern District of Texas served this Motion for Dismissal of Action upon all parties of record, including Silvia Beatriz Perez Ceballos and The Mexican State of Tabasco, by and through their attorneys of record through the District Clerk's electronic case filing in this cause.

/s/ Mary Ellen Smyth

Mary Ellen Smyth  
Assistant United States Attorney